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June 29, 2021

BY ECF

Hon. Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Huang, et al., 18 CR 408 (EDNY)

Dear Judge Cogan:

A. INTRODUCTION

This letter is submitted on behalf of defendant Xi Quan Huang in anticipation of his July 14, 2021 sentencing. With this letter, the defendant respectfully requests a sentence that is “sufficient, but not greater than necessary to comply with the purposes” set forth in 18 U.S.C. § 3553(a)(2) due, in part, to the “nature and circumstances of the offense and the history and characteristics of the defendant.” 18 U.S.C. § 3553(a)(1). The basis for this request is as follows: *first*, the criminal conduct in this case appears to be a marked deviation from Mr. Huang’s otherwise law abiding life, which included years of manual labor in both China and the United States; *second*, multiple mitigating factors exist, including the defendant’s advancing age and satisfaction of the \$266k forfeiture money judgment; *third*, unlike co-defendants Wei Mei Gao and Sheng Miao Xia, the defendant’s sale of counterfeit goods represented only a fraction of his otherwise legal business; and *fourth*, a review of the sentences already handed down by this Court in related cases suggest that a significant variance is warranted pursuant to 18 U.S.C. § 3553(a)(6). On balance, the prospects for Mr. Huang’s rehabilitation are very good and the goals of sentencing are not furthered by imposing a lengthy term of incarceration for this defendant.

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**B. THE DEFENDANT'S GUILTY PLEA
AND RESULTING GUIDELINES RANGE**

On September 23, 2019, Xi Quan Huang pleaded guilty pursuant to a plea agreement to Count One of a one-count Superseding Information which charged him and his two sons, Yun Lei Huang and Yun Wu Huang, with Structuring Financial Transactions, in violation of 31 U.S.C. § 5324(a)(3). See September 23, 2019 Plea Agreement ("Plea Agreement") at p. 1. Xi Quan Huang faces no mandatory minimum sentence and a maximum term of ten years imprisonment. Id.

As recounted in the Presentence Investigation Report ("PSR"), U.S.S.G. § 2S1.3 applies to this offense and sets a base offense level of 6, plus the number of offense levels from the table located in U.S.S.G. § 2B1.1 corresponding to the value of the structured funds. PSR at ¶ 33. With \$266k in funds at issue, 12 levels are added, resulting in a base offense level of 18. Id. Two levels are then added because the defendant was aware that the structured funds represented the proceeds of unlawful activity, i.e., the counterfeiting of retail leather goods and accessories. With three offense levels subtracted for acceptance of responsibility (§ 3E1.1), the total combined offense level is 17, carrying an advisory sentencing range in the Criminal History Category I of 24 to 30 months imprisonment. PSR at ¶¶ 40-42, 78.

**C. THE DEFENDANT'S BACKGROUND
AND THE NATURE OF THE OFFENSE –
APPLICATION OF § 3553(a) FACTORS**

Since the Supreme Court's decision in United States v. Booker, 543 U.S. 220 (2005), the Sentencing Guidelines have been rendered advisory in nature, leaving sentences to the district court's discretion, guided by the Guidelines and the other factors contained within 18 U.S.C. § 3553(a) and bounded by any applicable statutory minimum and maximum. This Section directs sentencing courts to "impose a sentence" that is "sufficient, but not greater than necessary, to comply with" the "need for the sentence ... to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense; to afford adequate deterrence to criminal conduct; [and] to protect the public from further crimes of the defendant" 18 U.S.C. §3553(a)(1)-(2) (emphasis supplied). In making this determination, courts are to consider "the nature and circumstances of the offense and the history and characteristics of the defendant" 18 U.S.C. § 3553(a)(1). With these aims in mind, we offer the following for the Court's consideration.

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The Nature of the Offense

From December 2013 through December 2017, Mr. Huang operated Rongfa Leather Corp. (“Rongfa”) with his two sons, a “wholesale generic handbag and accessories business that they owned and operated in Queens, New York.” PSR at ¶ 14. The business “imported generic and counterfeit handbags, accessories and other items,” and in total “the family’s business gained approximately \$266,000 from the ... offense” PSR at ¶ 18. As the PSR further observes, “Xi Quan Huang was not a leader or organizer within the scheme,” however, he was “aware of the scope of the broader [counterfeiting] conspiracy[] and was given discretion in his handling of the funds he made” *Id.* Mr. Huang then structured the illicit proceeds that he received to evade bank reporting requirements.

Without detracting from the defendant’s sincere acceptance of responsibility for knowingly participating in this scheme, it is important to note that Rongfa was not solely engaged in the business of selling counterfeit leather goods and accessories. To the contrary, the company also lawfully purchased large quantities of generic leather items from China that were then sold via their Queens based business. Indeed, corporate tax returns filed for Rongfa from 2013 through 2016, a subset of the charged period, reflect over \$1.7M in revenue – the \$266k worth of infringing goods from this case therefore represents only a fraction of total sales for the business. Put another way, the Huang defendants did not solely operate a criminal enterprise as did others in the broader conspiracy. Instead, much of their business was legitimate.

Sentiment and Violence Against Asians Vitiates in Favor of Leniency

As observed in the submissions of Mr. Huang’s two sons, since previous sentencings in this case, violence against Asian Americans has skyrocketed due to the coronavirus pandemic. By one recent account, “anti-Asian hate incidents nationwide have jumped from roughly 100 annually to nearly 3,000 reports” over the past year.¹ The Huang defendants – non-citizen

¹ Nicholas Wu & Marianne Levine, “Senate Faces a New Post-Tragedy Quagmire as Anti-Asian Hate Crimes Rise,” *Politico* (Mar. 28, 2021), available at: <https://www.politico.com/news/2021/03/28/asian-american-hate-crimes-congress-478168> (last visited June 21, 2021); *see also, e.g.*, Nicholas Wu, “White House Unveils New Actions to Counter Rising Anti-Asian Violence,” *Politico* (March 30, 2021) (reporting that White House “rolled out a series of executive actions aimed at addressing a spike in anti-Asian American hate incidents in the aftermath of a shooting in Atlanta that killed six Asian American women,” including an announced “Covid-19 Equity Task Force to address xenophobia against Asian Americans and a Justice Department cross-agency initiative addressing rising hate crimes against Asian

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Chinese nationals with limited proficiency in English – may thus face a heightened risk of racially motivated violence amid a prison population of hardened criminals ravaged by Covid-19.² Compounding this risk is Mr. Huang’s advanced age and timid demeanor. Given his “extreme vulnerability” to prison abuse, a non-custodial sentence – or a custodial sentence to be served by home confinement – may be uniquely more appropriate in this case. See United States v. Lara, 905 F.2d 599, 603 (2d Cir. 1990) (recognizing “extreme vulnerability” to prison abuse as a “proper ground for departure” from then-mandatory Sentencing Guidelines). This is especially true where prison officials’ “only means” to “protect” Mr. Huang may result in extended placement in “solitary confinement” – exceedingly harsh treatment otherwise unwarranted on the facts and circumstances presented in this case. Id. at 602-3.

Comparison to Similarly Situated Defendants

The Guidelines calculation by the government and Probation accurately reflects Xi Quan Huang’s culpability relative to the other defendants in this case and the related dockets. With a total offense level of 17, Mr. Huang is admittedly more culpable than a Qi Fen Liang, who briefly operated a counterfeit accessories business of a temporarily detained relative, resulting in a total offense level of 12, Guidelines of 10-16 months imprisonment and a sentence of time served. Huang, however, is less culpable than Xue Wei Qu, who became wealthy from her trade in comparatively high-grade knockoffs, resulting in a total offense level of 19, Guidelines of 30-37 months and a sentence of 366 days imprisonment – just 40% of the bottom of her Guidelines range. See Gov’t Sentencing Ltr. at 5, United States v. Que Wei Qu, No. 18 CR 419, ECF No. 93 (describing “Qu’s net worth” as “substantial”).

Further, as noted above, Xi Quan Huang’s legitimate trade in generic handbags further distinguishes him from codefendants Xia and Gao, who dealt “almost exclusively” in contraband, selling high-end knockoffs on their own account, while operating a shipping business that served as “the FedEx for [other] counterfeit-good shippers.” Gao Sentencing Tr. at 16. Gao, who faced Guidelines of 30-37 months, received a sentence of six months imprisonment, and Xia, who was similarly a level 19, received a downward variance to 366 days.

Americans”), available at: <https://www.politico.com/news/2021/03/30/biden-executive-actions-anti-asian-violence-478491> (last visited June 21, 2021).

² See, e.g., Madeleine Carlisle & Josiah Bates, “With over 275,000 Infections and 1,700 Deaths, COVID-19 Has Devastated the U.S. Prison and Jail Population,” Time (Dec. 28, 2020), available at: <https://time.com/5924211/coronavirus-outbreaks-prisons-jails-vaccines/> (last visited June 21, 2021).

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We simply ask that the sentence received by Mr. Huang remains in line with the significant variances received by these defendants, bearing in mind his personal and individual circumstances noted herein and his relative culpability. See 18 U.S.C. § 3553(a)(6) (courts are to consider “the need to avoid unwarranted sentencing disparities among defendants with similar records who have been found guilty of similar conduct”); Freeman v. United States, 131 S. Ct. 2685, 2694 (2011) (Sentencing Reform Act “aims to create a comprehensive sentencing scheme in which those who commit crimes of similar severity under similar conditions receive similar sentences”).

The History and Characteristics of the Defendant

i. An Extraordinarily Difficult Childhood, Asylum and Manual Labor

As recounted in the PSR, Mr. Huang experienced a childhood that most Americans would find horrific. Born and raised in a rural area of Southeastern China, the defendant was severely impoverished. PSR at ¶ 52. His family of six lived in a four room wooden house with “no heat, no running water and no indoor plumbing.” Id. The family was often “short of food” and at times, he had “nothing but sweet potatoes to eat.” Id. Mr. Huang completed the equivalent of the eighth grade, but thereafter, his parents could no longer afford for him not to work and he left school. Id. This was not surprising to the defendant – his father was similarly uneducated and completed only three years of formal schooling. Id. In his letter to the Court, the defendant’s uncle, Cai Xiang Huang, recalls: “It is fair for me to say that Xi struggled through a difficult childhood. Most, if not all of the adults needed to work an inhumane number of hours just to make ends meet. *As a result, Xi was often neglected [and] improperly cared for*” May 26, 2021 Letter of Cai Xiang Huang, attached as Exhibit A (emphasis supplied).

Mr. Huang remained in China until approximately 1998, when he moved to Italy and began the process of petitioning the United States for asylum due to China’s coercive population control program that limited families to a single child. PSR at ¶ 56. Upon his arrival in the United States, Mr. Huang entered the job market immediately, engaging in physically demanding jobs that have now left him years later with significant back pain and herniated discs in his spine. See PSR at ¶ 58. From 1998 through approximately 2004, he worked as a laborer in various garment factories in New York – as did his wife – and thereafter, from 2004 from 2012, he worked as a day laborer and mover. PSR at ¶¶ 67-68. It was not until 2012 when the defendant began working in the clothing and leather goods industry. PSR at ¶ 66.

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ii. A Dedicated Friend and Family Man

The letters appended to this submission provide a detailed account of the defendant, describing him as a “good man and a very good grand[father] [who] loves his family very much.” February 1, 2020 Letter of Huijuan Ye, attached as Exhibit B.

In her letter to the Court, the defendant’s wife, Chunliu Du, explains that both she and her husband grew up in a “very small village” in China and both had “poor famil[ies].” December 10, 2019 Letter of Chunliu Du, attached as Exhibit C. The subject of an arranged marriage, Chunliu was just 15 years old when her father “betrothed” her to the defendant and soon thereafter passed away. Id. As Chunliu recalls, Mr. Huang began helping to plant seedlings and harvest crops at her home. No matter how busy he was with his own family, he would “come to her house and help.” Id. After they were married and Mr. Huang was working on a farm, he would come home and help take care of his wife and newborn baby at the end of his day, doing the laundry, cleaning and cooking. Id. Despite her husband’s best efforts, Chunliu further recounts in her letter that they were so poor when they lived in China that other “villagers [would] sometimes send [them] eggs” so that they had enough to eat. Id.

Mr. Huang’s daughter-in-law, Huijuan Ye, provides a similar account of the defendant’s general helpfulness and support of his family, especially his grandchildren. Specifically, when Ms. Ye was pregnant, Mr. Huang would cook for her and help her with housework – and after she gave birth to his granddaughter, he tried to educate her on cooking nutritious meals for her child. Ltr. of Huijuan Ye, Ex. B. Today, because Ms. Ye and her husband work long hours, Mr. Huang picks up his grandson from daycare every day, as well as his granddaughter from her school. Id. And even when they are not in school or daycare, he looks after his grandchildren frequently and cooks for the family “every night.” Id.; see also Ltr. of Cai Xiang Huang, Ex. A (“Sometimes I feel jealous and wished that my own son could be more like [Mr. Huang]. *Xi takes his filial duties seriously and with heart*”) (emphasis supplied).

Close friend CaiWei Zhang confirms for the Court that Mr. Huang is “gentle, kind considerate, caring, trusting and dedicated to the well-being of others,” adding that he “goes out of his way to help,” and has “shoveled snow for his elder[ly] neighbors” November 18, 2021 Letter of CaiWei Zhang, attached as Exhibit D; see also Ltr. of Cai Xiang Huang, Ex. A (“he would always take the time to visit me [or] drive me to the doctor if my own children are busy”). Similarly, friend Qin Li adds that the defendant “has the reputation for being a kind, caring and responsible person to his famil[y], his friends, and anyone he ha[s] known,” and further, that he “help[s]” others “in the time ... [that he is] most needed” December 2, 2019 Letter of Qin Li, attached as Exhibit E.

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Friend and former garment factory coworker Cui Lan Chen describes Mr. Huang as “a responsible family [man] who is willing to expend every ounce of energy in his body to provide for his family.” May 19, 2021 Letter of Cui Lan Chen, attached as Exhibit F. Of his own experiences with the defendant, Mr. Chen recalls in his letter their time working together:

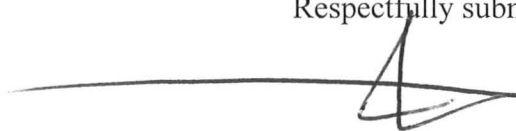
I have encountered numerous situations where I needed help during my career. Naturally, each and every employee at the factory [was] working hard every minute of the day to earn enough money to pay [their] bills, however, Xi often volunteer[ed] his own time to assist me when necessary, and not because he expect[ed] any credit in return[,] but rather he is just simply a good and altruistic person.

Id. (emphasis supplied). Finally, Mengxue Cai, who considers the defendant an uncle, recalls for the Court that Mr. Huang supported his parents when they immigrated to the United States from China – helping them find jobs and to babysit during his “parents’ long shifts.” November 20, 2019 Letter of Mengxue Cai, attached as Exhibit G. There can be no question, therefore, that the defendant is a man who is heavily relied upon by friends and family members.

D. CONCLUSION

Defendant Xi Quan Huang comes before this Court asking for mercy. A difficult life filled with good deeds and hard work has been marred by his criminal actions. Nevertheless, as the enclosed letters reveal, Mr. Huang is a decent and giving man, and unlike many defendants, has made very sincere efforts to help family and friends in any way possible throughout his life. For these reasons and the others stated herein, a lenient sentence is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Jeffrey Lichtman', written over a horizontal line.

Jeffrey Lichtman
Jeffrey Einhorn

Encs.

cc: AUSA William Campos (by ECF)

EXHIBIT A

From:
Cai Xiang Huang
3-28 149th Pl, 2nd Floor
Whitestone, NY 11357

26th of May 2021

RE: Character letter for Xi Quan Huang

Your Honor,

My name is Cai Xiang Huang and I am 85 years old. Xi Quan Huang is my nephew and I watched him grow up like he was my own son. Having seen him and his immediate family go through ups and downs, it is fair for me to say that Xi struggled through a difficult childhood. Most, if not all, of the adults in the family needed to work an inhumane number of hours just to make ends meet. As a result, Xi was often neglected, improperly cared for, and may not have received the proper guidance in establishing a complete moral compass. Despite his handicapped upbringing and meager living situation, Xi Quan Huang has always been good and kind to others, especially to family.

Filial piety is the highest virtue in the Chinese culture, and I can say with certainty that Xi has mastered this virtue. I have always been in awe at Xi's respect for the elders. Sometimes I feel jealous and wished that my own son could be more like my nephew. Xi takes his filial duties seriously and with heart. During the Chinese holidays, he would always visit and bring gifts to all his elders. Whenever I feel ill, he would always take the time to visit me, drive me to the doctor if my own children are busy, and see to it that I take my medicine. He is genuinely kind and good to elders.

It saddened me when I found out about Xi's misdeed, but it breaks my heart even more that Xi, a good person ever since he was a child, may be punished for a deed that may have been influenced by an unfortunate childhood. I completely understand that an unfortunate upbringing need not mold the rest of one's life, and growth as a person is a complicated process that involves unlimited possibilities and choices. However, one thing is for sure, a person who naturally practices the highest virtue in all of China's history must be a good and decent person. I humbly ask for leniency on Xi Quan Huang's behalf. Thank you for taking the time to read my letter.

Yours Truly,

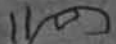

Cai Xiang Huang

EXHIBIT B

2/1/2020

Hon. Brian M. Cogan
United States District Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Dear Judge Cogan,

My name is Huijuan Ye. I'm Xiquan Huang's daughter-in law. I understand that he will be sentencing before you in April. I'm writing this letter to considerate he is a good man and a good elder.

I know him since 2011. I remembered that when I first time met with him; he was very kind of me. Every time when I went to his house, he always asked me what do I like to eat and he would prepare those foods for me. Typically, the table was full of my favorite dishes and fruit. After I married to his son, nothing was changed. He still treated me very kindly just like a father. After I was pregnant, he would help me to clean the floor sometimes. He also would bring some foods which are good for a pregnant woman. He won't let me to cook the food because he thought cooking is not good for pregnant woman, especially to kill fish or cut the meat. In old Chinese traditional days, if a pregnant woman kills a fish it would cause the baby to be disabled. That's what the older generation said. After my daughter was born, he bought a nutrition cooking book for me and told me that I have to cook these foods for his grand-daughter.

He is a very good grand-pa. My kids like him so much. He sometimes drops off my son to the daycare (sometimes drops-off by my husband-Yunwu), but picked up every day. My husband and I need to go to work, and the day care requests to pick up before 6:00pm. He also needs to pick up my daughter from the public school every day. While we're at work, he usually takes care of the children. He would get up at the same time as us just for watching the kids so I and my husband had time to do our stuff. He has a problem with his waist i.e. he cannot stand for a long time. However, he would prepare for foods/dinner for the whole family birthday and the holiday season as well. It was very hard, but he never said it. Right now, he cooks every night. We have hot food as soon as we get home. I really appreciate my father-in-law. Because of him, I just need to work hard and not be careful at home and the children.

At the last, I want to say he is a good man, a very good grand-father. He loves his family very much. I hope you can take this letter into consideration at the time of sentencing.

Thanks for taking time to read my letter.

Sincerely,

Huijuan Ye

A handwritten signature in black ink, appearing to read 'Huijuan Ye', written over a horizontal line.

EXHIBIT C

December 10, 2019

Hon. Brian M. Cogan
United States District Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Dear Judge Cogan,

My name is Chunliu Du, the wife of Xiquan Huang. My husband and I lived at a poor family. When I was 15 years old, my father betrothed me to him. My family condition is very difficult. The village I was lived just a few other families. It is a very small village.

I was starting to work at family at 5 years old. At that time, the family income was from brick work, handmade. I helped my sister to bring out the brick to the road to dry. I started to make the brick by myself when I getting older, working every day until I met with my husband.

No longer after my engagement, my father was passed away. Xiquan started to came to my house to help to do the harvest or seedlings, and some family work. No matter how busy was his own family; he would come to my house and help. My entire family likes him so much. I never went to school because my family was too poor. Everyone looks down on me in the society, but my husband never would. He still loves me.

Later on we married. I worked at home and do some handwork things. After one year later, our first baby was born. The live started to be more difficult. My husband not only goes to the farmland, also needs to help me to do the laundry, clean house and cooking. He also needs to help me to take cares the baby. Basically, the branches we used to cook were brought by him from mountain. He was really working very hard. I wanted to share it with him, but he won't let me. He said you've done so many things at your own family, now you've married to me; I won't let you working that hard again. I was really moved.

My husband treats other people also very kind. I remembered one year, on his way home, he met a child who fell into the water, so he jumped down and save that kid. Everyone in the village likes him very much. When we don't have any money, the villagers sometimes send us eggs. I believe it's because my husband is a very good man.

I believe this happened because we didn't understand the law. I hope you can give him a second chance. My family can't live without him. Because of him, my older son and daughter-in-law can go to work. My entire family economy came from them. My husband was worked too hard when he was young. Now his waist is going to hurt more and more, and it's getting worse and worse. I hope he can go to China as soon as possible to see traditional Chinese medicine.

Sincerely,

Chunliu Du

CHUNLIU DU

EXHIBIT D

CaiWei Zhang
22-17 125th Street 1FL,
College Point, NY 11356

November 18, 2019

Your Honor,

The aim of this letter is to present the good character of XiQuan Huang. My name is Caiwei Zhang and I am his friend. We have been close friends for the past 15 years as we resided in the same town before migrating to the USA. I can confirm that he is gentle, kind, considerate, caring, trusting and dedicated to the well-being of others.

He is a good and responsible father, a loving husband and support of the family and a truthful friend. He set examples for his children as he teaches them great values of how to be a family person. He is trustworthy and goes out of his way to help others, related or a complete stranger. He has shoveled snow for his elder neighbors during the winter.

He is well-regarded among the Chinese Wenzhounese circle as a person of high integrity and honesty. We have been together in several emergency situations, and he has always conducted with dignity and compassion.

I am aware that he has pleaded guilty to the charge. However, I wish to express that he was not knowingly broke the law. Mistrusted wrong people in the past had led to today's misfortune, and this unfortunate situation was most probably one-of-a-kind. He has expressed to me many times that he is extremely regretful and sorry for it.

I hope this letter will give you an idea of his good character and help him get a second chance to prove this was an unusual occurrence.

Thank you for taking the time to read this letter.

Sincerely,

Zhang, CaiWei
CaiWei Zhang

EXHIBIT E

Qin Li

149-32 24th Ave
Whitestone, NY 11357

December 2nd, 2019

Your Honor,

This is a letter showing the good personality of XiQuan Huang, my best known friend for more than ten years. We are from the same town before we came to the U.S., he always has the reputation for being a kind, caring and responsible person to his families, his friends and anyone he had known.

XiQuan Huang is a faithful husband and a responsible father. He works notably hard to support his family, taking care of them with love and discipline. He passes down traditional family value and good deeds among his children and grandchildren, helping to correct their misbehavior when they need it.

He is also well regarded among all his friends. We all trust him unconditionally just like the way he helped us in the time we most needed. XiQuan will provide all he can to help those who need a hand whether he knows them for long time or meets briefly.

However, anyone could make a bad decision under the wrong circumstance. XiQuan's kindness to people has been misguided, used and turned him into misjudgments that resulted in this misfortune. I acknowledged his pleaded guilty to the charge, which would be an opportunity to get his redemption and ease the bad impact on his family and friends. He has been confessing to me that he is extremely sorry and regretful for this situation and promised he will never let it happen again in his lifetime.

Hopefully, this letter will give you a better idea of who he really is, and the rarity of his misjudgement. Please give him a chance to continue the good deeds and the decent value he always believed.

Thank you for your time and consideration.

Sincerely,

Qin Li

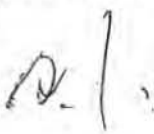


EXHIBIT F

Cui Lan Chen
328 149th Place
Whitestone, NY 11357

May 19, 2021

Your Honor,


I am writing this letter to express my opinion of Xi Quan Huang's character. My name is Cui Lan Chen and Xi Quan Huang was my colleague for many years at a garment factory. He is a true gentleman and a pleasure to work with.

Xi has outstanding work ethics and would always make himself available to assist wherever he can despite needing to balance between his work and family obligations. Xi is a responsible family person who is willing to expend every ounce of energy in his body to provide for his family. Although Xi is a person who mostly keeps his emotions and hardships to himself, at times he would confide in me and tell me about his depression and regrets of being unable to provide a better and stable life for his family, which was something he never had growing up. The last thing Xi wants is for his family to endure the same hardships that he had to struggle. It is evident that his will to protect and provide for his family is what motivates his dedication and hard work.

I have encountered countless situations where I needed help during my career. Naturally, each and every employee at the factory are working hard every minute of the day to earn enough money to pay the bills, however Xi often volunteers his own time to assist me when necessary, and not because he expects any credit in return but rather he is just simply a good and altruistic person.

I can vouch for the right character of Xi Quan Huang, and I would request you to consider this character letter before finalizing any verdict. Thank you for your time.

Regards,



Cui Lan Chen

EXHIBIT G

Mengxue Cai
22-17 125th Street 1FL,
College Point, NY 11356

November 20, 2019

RE: Character Reference for Huang, Xiquan

Dear Honorable Judge,

My name is Mengxue Cai and I am a full-time graduate student at the University of St. Augustine. Uncle Xiquan Huang is a close family friend that I've met him through my parents. ~~I've known him for almost 20 years and he is like a real uncle to me.~~ When my parents first immigrated from China, Xiquan helped us a lot. We are forever grateful for his selfless and caring acts. He helped my parents settled into this new life as it was tough living in China. He helped my parents find jobs and as well as help babysit my sister and I along with his children during my parent's long shifts. Growing up, I've noticed him as a caring, family man who tries his best to care for his children and his wife.

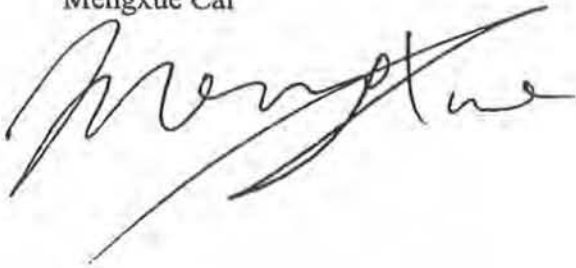
He always teaches his children to be respectful and show integrity to everyone. He is an optimistic, humble and thoughtful person. I can confirm that he is a trusting and responsible person who is dedicated to the well-being of others. He has confined in me in the mistakes that he has made and is greatly regretful of that. He is remorseful and I believe that he deserves a second chance. I cannot imagine if he is not here with his family.

I hope this letter will provide some insights as to Xiquan's good character and give him a second chance.

Thank you for taking the time to read this letter.

Sincerely,

Mengxue Cai

A handwritten signature in black ink, appearing to read 'Mengxue Cai', with a long horizontal stroke extending to the right.